

EVERLEGAL CODE

OF ETHICS & BUSINESS CONDUCT

2022

Our shared
expectations unite us

Leadership Message

At EVERLEGAL we truly value our clients and believe in customer-first strategy. As a team we share same values and maintain strong corporate culture

Our shared expectations unite us

In order to maintain our reputation as a trusted, ethical company, we expect the team as a whole and each of our employees to commit to the common goal, aim to bring the best practices to EVERLEGAL and ensure that our values come alive through our actions. Every day when we come to work, we have the opportunity to bring our expectations to life.

EVERLEGAL CODE OF ETHICS & BUSINESS CONDUCT (the “Code”) defines our core values, sets the direction and provides guidance to ensure that a positive culture and high ethical standards remain a natural part of our everyday operations.

It helps us try to make the world a better place together.

YEVHENIY DEYNEKO
MANAGING PARTNER



Yevheniy Deyneko
Managing Partner

This Code sets out the following:

Part 1: About EVERLEGAL
& Our Values

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Part 2: Our Policies

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Part 3: Sustainability

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Part 4: Corporate Social
Responsibility

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Part 5: Our Customer
Service Rules & Policies

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Part 6: Data Protection
and Privacy Policy

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Part 1:

About EVERLEGAL & Our Values



EVERLEGAL

Who we are

EVERLEGAL is an independent sector-focused Ukrainian law firm. Established in 2015, today, our firm unites 50 lawyers and ranks among **TOP-10 law firms in Ukraine**.

Our mission is to be a legal business partner for our clients in the most demanding projects to enable them to create and grow sustainable businesses and ecosystems for a better future.

We achieve this by providing business-savvy and pragmatic legal advice through engaging top legal talent, focusing on and understanding client's business, and using innovative ways of servicing our clients.



Our values



Team players



- We build strong and healthy teams
- We trust each other
- We have a common goal which unites the team in effective work to achieve a maximum result for the clients



Open & supportive people



- We value mutual support, help and understanding
- We are open with each other and our clients



Proactivity, ambition & interest



- We strive to be involved, active and positive
- We are passionate about our work and ambitious



Clients' happiness



- We create a WOW client experience
- We act above client's expectations
- We want to keep clients coming back to us



Responsibility & deadlines



- We always ensure our 100% availability during business hours and upon agreement are ready to meet client's needs outside the business hours should such necessity occur for continuity of business



Transparency, equality & diversity



- We have an open-door policy
- We are open to people of different age/gender/race etc
- We encourage diversity



Life & work balance



- We play intellectual games
- We engage in extracurricular activities
- We do sports etc.

Part 2:

Our Policies

#1 Policy:

Human Rights



We at EVERLEGAL strive to respect and promote human rights. We encourage diversity, inclusion and we are open to people regardless of their age, ethnic origin, location, language, health condition, political or religious beliefs, ethnicity, or any other status.

- We provide the same opportunities and consider it our responsibility to recruit our new team members based on their fitness for the job and other objective and non-discriminatory criteria.
- Similar rules apply to the promotion and remuneration of our existing team members, which is based on their performance, quality of work, compliance and other objective and non-discriminatory criteria.

EVERLEGAL does not tolerate any discriminatory, disrespectful, inappropriate behaviour, as well as any form of harassment in the workplace and in any work-related circumstances outside the workplace

#2 Policy:

Anti-Slavery and Human Trafficking



Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business

#3 Policy:

Anti-Bribery & Corruption



EVERLEGAL follows the policy of zero tolerance for corruption and supports the United Nations Sustainable Development Goal 16, which target is to substantially reduce corruption and bribery of all forms as part of international effort aimed at ensuring peace, justice and strong institutions.

Anti-Corruption Program

If you want to know more about our Anti-Bribery & Corruption Policy, please, review our [ANTI-CORRUPTION PROGRAM](#)

In this Anti-Corruption Program, EVERLEGAL declares that its employees, officials, managers and founders (participants) in their internal activities and legal relations with business partners, including public and local authorities, shall be guided by the principle of zero tolerance to any manifestations of corruption, and shall take all lawful measures to prevent, detect and counter corruption and related actions (practices).

#4 Policy:

Health and Safety



EVERLEGAL creates an employee friendly environment. We promote healthy lifestyle, and we are bike friendly company.

We believe that a positive, safe and healthy working environment is the key to favourable development of each team member. We create the appropriate conditions to achieve that, and we always comply with all local laws and regulations that concern health and work safety.

Providing a safe and healthy workplace is part of our culture, and is embedded in our purpose to make a difference.

Part 3:

Sustainability

We consider *Sustainability* not as a goal of responsible business, but more like a journey we share with our clients.

At EVERLEGAL we believe in big ideas. We also believe in collaborations for creating a better future for our communities, clients, business partners and peer law firms. To this end, in 2021 we created at our firm what we call a Sustainability direction as our way and commitment to helping achieve global sustainability goals by acting locally. The new direction also allows us to openly declare what our values are and actively reach out to like-minded businesses and organisations for cooperation.

Sustainability direction at EVERLEGAL includes:

- **SUSTAINABLE BUSINESS & SUSTAINABLE MANAGEMENT**

(What we can do as a responsible business in Ukraine. How do we implement sustainability into the operational activity of our company)

- **SUSTAINABILITY & OUR CLIENTS**

(Our work with clients on notable projects contributing to SDGs)

- **SUSTAINABILITY & OUR PROJECTS**

(Projects we support and our own initiatives contributing to SDGs)



Sustainability Progress Report

At the end of 2021, we presented our first sustainability report. It includes our approach, achievements, and future priority commitments, aligned with where we feel EVERLEGAL can make the most outstanding contribution to the achievement of the UN Sustainable Development Goals (SDGs):

[Sustainability Progress Report 2021.](#)

For 1 year we took the following significant steps in the Sustainability direction:

- We were the first Ukrainian law firm to launch the Sustainability direction and a legal support program for sustainability initiatives.
- We established a COVID-19 advice desk to support our people and clients in their response to the pandemic.
- We worked with our clients on notable projects contributing to SDGs.
- We contributed to the regulatory environment to foster sustainable development in Ukraine.
- We supported over 10 organisations focused on sustainable development within our Pro Bono legal support program.
- We committed to reducing our electricity use, our paper & plastic consumption, and our carbon footprint by 2025.
- We joined the Association of Sustainable Development Experts to support the association in achieving its goals of creating a sustainable environment, as well as helping the communities to develop a clear understanding of sustainability, understand risks and see opportunities for the future.
- We became a partner in a project facilitating inclusive cinema in Ukraine and providing accessible video content for people with hearing and visual impairments.

A lot of work has already been done, but even more work remains ahead of us, given that sustainable development is a part of our strategy.



Part 4:

Corporate Social Responsibility

A person in a red and white kayak is paddling on a calm, blue lake. The kayaker is wearing a blue jacket and a white cap. The background features a range of mountains, with the highest peaks covered in snow and partially obscured by a light mist or fog. The water is still, reflecting the sky and the surrounding landscape.

EVERLEGAL is a socially responsible firm.

Our team actively takes part in many pro bono and charity/volunteer projects in addition to implementing our own social initiatives.



Corporate Social Responsibility is very important to our team. This philosophy unites values that shape our brand's significance in today's society!

1 ENVIRONMENT. EVERLEGAL's values are based on the environmental awareness that affects each of us today: from large, medium and small businesses to each individual member of our society.

EVERLEGAL is a responsible business. We are concerned about the impact of climate change both on a local and global level. We are conscious of our environmental impacts and strive to reduce them by developing our Sustainability direction at EVERLEGAL, as well as by supporting projects that adhere to these goals.



2 EDUCATION. The EVERLEGAL team values quality education. We understand how important people are to any company, and the staff at EVERLEGAL are most certainly our main asset. We invest resources and time to support educational initiatives aimed at improving the level of education of young people in Ukraine.



3 PRO BONO PROJECTS. We have a Pro Bono partnership program at EVERLEGAL. Our lawyers support public organisations that implement projects in the social sphere, develop technology, and improve the general quality of life in Ukraine and abroad. In addition, our team supports non-profit organisations by taking part in their events and projects.

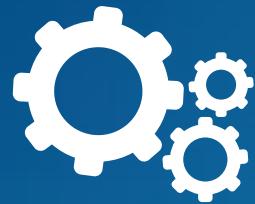


Part 5:

Our Customer Service Rules & Policies

Part #1

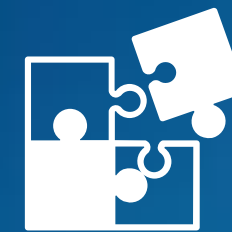
In order to meet the standards for high quality & transparent legal services, EVERLEGAL provides legal advice based on the following principles:



We use a **comprehensive and integrated approach** to optimise the development of our clients' business, in particular, we implement and complete projects on a **"turn-key" basis**, which includes legal support in corporate, regulatory, employment and commercial matters, as well as financing and further development of business depending on the client's field of activity.



We assess risks objectively and commercially without overrating them but, at the same time, assessing them prudently and finding legally optimal and commercially viable solutions to make sure that deals are done and not unnecessarily frustrated.



We follow a "synergetic" approach in client's advising. For every assignment EVERLEGAL form a separate team which is a synergy of lawyers with relevant background and professional expertise in order to provide full, fast and effective support of the client's needs.



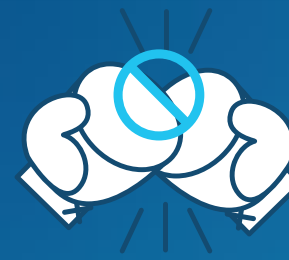
We follow the "four eyes" policy which means that every deliverable sent to the client is always reviewed by at least two lawyers, one of such lawyers being a senior associate or a partner. Therefore, we will always involve senior lawyers (a senior associate or a partner) on any assignment for the client to ensure proper quality.

Part #2

In order to meet the standards for high quality & transparent legal services, EVERLEGAL provides legal advice based on the following principles:



We always follow the policy of **zero tolerance for corruption** in our work with clients. If you want to know more about our Anti-Bribery & Corruption Policy, please, review our [ANTI-CORRUPTION PROGRAM](#)



We understand that **avoiding conflicts of interests** is a very important condition for the proper provision of professional and especially legal services. Therefore, in regards to our clients and their transactions, If a conflict of interests is ascertained, either the whole firm or individual members of our team are excluded from any participation on the transaction in question



While completely apolitical, EVERLEGAL fully complies with any legislation in effect that introduces trade sanctions or retaliations in any concerned jurisdiction

Part 6:

Data Protection & Privacy Policy

GENERAL INFORMATION

- EVERLEGAL ("we" or "us"), being a controller of personal data, highly respects your right to privacy and takes the matter of your personal data protection very seriously.
- When we collect various personal data and information necessary to duly carry out our business, we acknowledge the responsibility to protect their confidentiality and security.
- We adhere to the requirements of the Law of Ukraine "On Protection of Personal Data" No. 2297-VI dated 1 June 2010 and other instruments of Ukrainian legislation regulating personal data protection as well as introduce the best practices to insure the security of data you share with us.

SECURITY

- We implement all of our best efforts to ensure security and protection of your personal data.
- Only a limited number of employees will have access to your personal data. These employees with access to your personal data will sign a non-disclosure agreement and will complete training on how to work with personal data

YOU ENJOY THE FOLLOWING RIGHTS REGARDING YOUR PERSONAL DATA:

- to know about the sources of collection and the location of your personal data, the purposes of its collection, the location of the controller and processor;
- to obtain information about the terms of access provision to your personal data, in particular, information about third parties to which your data can be transferred;
- to access your personal data;
- to obtain an answer within a period of 30 (thirty) calendar days, if your personal data is processed, as well as obtain the content of such personal data;
- to object to the processing of your personal data;
- to apply with a request to change or destroy your personal data;
- to introduce reservations regarding limitation of the right to process your personal data while giving your consent;
- to withdraw your consent to process your personal data;
- to know the mechanism of automatic processing of your personal data;
- to the protection of your personal data from illegal processing and accidental loss, destruction, damage, non-provision, or delayed provision as well as to the protection from provisions of information that is unreliable or a discredit to your honour, dignity, and/or business reputation;
- to file complaints regarding the processing of your personal data to the Ombudsman;
- to apply tools of legal protection in case of violation of the legislation on protection of personal data; and
- to protection from decision, made only on the basis of automatic processing of your personal data, and which has legal consequences for you.

CONTACT INFORMATION

If you have any questions, objections, suggestions, or complaints regarding the below information, you may contact us via email below.

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EVERLEGAL – PARTNER OF THE FUTURE

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expectations unite us